

## MODULE III

### STORAGE AND TREATMENT IN CONTAINERS



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## **MODULE III - STORAGE AND TREATMENT IN CONTAINERS**

### **III.A. APPLICABILITY**

- III.A.1. The requirements of this permit module pertain to the operation of hazardous waste container storage areas at the Grassy Mountain facility. The Permittee shall comply with R315-8-9 and all conditions of this permit. For the purposes of this permit, the Container Management Building and the Bulk Solid Storage Area (BSSA) are designated hazardous waste storage areas.
- III.A.2. All containers shall be managed in accordance with this module.
- III.A.3. Non-liquid waste received in bulk transport containers cannot be stored for a period that exceeds one year. All containers located in the BSSA shall be inspected daily and managed in accordance with R315-8-9.6.
- III.A.4. PCBs in containers shall be managed in accordance with Attachment III-1, the Waste Management Plan for Polychlorinated Biphenyls.

### **III.B. WASTE IDENTIFICATION**

- III.B.1. The Permittee may store the wastes listed in Attachment II-WAP Appendix 2 column 2 in containers at the facility, subject to the terms of this permit.
- III.B.2. CERCLA Hazardous Wastes. The Permittee may receive wastes that arrive without EPA waste codes, provided that these wastes are from remediation sites regulated under CERCLA and they comply with all CERCLA off-site management policies. These wastes shall be managed as hazardous wastes and are subject to the terms of this permit.
- III.B.3. The Permittee may store, treat and dispose of waste with a P999 waste code, but only if the waste is also subject to the F999 waste code.
- III.B.4. RCRA/TSCA Wastes. The Permittee may receive wastes that arrive with EPA waste codes and are also regulated by TSCA. These wastes are subject to the terms of this permit.

### **III.C. CONDITION OF CONTAINERS**

- III.C.1. If a container holding hazardous waste is not in good condition (e.g., severe rusting, bulging, apparent structural defects) or it begins to leak, the Permittee shall transfer the hazardous waste from such container, or

the container of hazardous waste itself, into a container that is in good condition or manage the waste in some other way that complies with the requirements of R315-8-9.2. This shall be completed as soon as possible, but no later than 24 hours from the time the problem was first discovered and noted in the Operating Record.

- III.C.2. Facility personnel shall ensure that the replacement containers referenced in Condition III.C.1. are sufficiently labeled to allow identification and tracking of the waste while it is managed at the facility.
- III.C.3. Alternately, contents of leaking or damaged containers may be emptied directly into treatment processes providing all appropriate fingerprint analyses have been performed.

#### **III.D. COMPATIBILITY OF WASTE WITH CONTAINERS**

The Permittee shall assure that the waste is compatible with the containers as required by R315-8-9.3.

#### **III.E. MANAGEMENT OF CONTAINERS**

- III.E.1. Containers shall always be closed except when the Permittee is adding or removing material from containers as allowed by R315-8-9.4. The Permittee shall not store or move containers in a way that may cause the containers to leak.
- III.E.2. The Permittee shall place the hazardous waste from the transport vehicle into storage or onto another transport vehicle for shipment to another facility within ten days from arrival at the site. Arrival for purposes of this permit will be the day the transport vehicle comes through the gate of the Grassy Mountain Facility.
- III.E.3. Containers may be off-loaded directly into treatment or disposal processes without first being placed in storage providing all inspection and treatment requirements of this permit have been satisfied.
- III.E.4. The Permittee may store LDR wastes for a period of one year for the purpose of accumulation to facilitate proper treatment or disposal. Justification for storage of these prohibited wastes beyond one year shall be included in the Operating Record as required by R315-13-1 and a letter with the justification provided to the Executive Secretary.
- III.E.5. Containers of RCRA/TSCA waste may be stored in the Container Management Building.

**III.F. CONTAINER MANAGEMENT BUILDING CONTAINMENT AREAS AND CAPACITIES**

- III.F.1. The Permittee shall manage the container management facilities in accordance with the R315-8-9.6. For purposes of this section, a container shall be considered full when calculating the number of gallons stored. The Permittee may store the following quantities of hazardous wastes and/or RCRA/TSCA wastes:
- III.F.1.a. Dock 1 - maximum capacity 18,850 gallons of liquid waste in containers; (This area is also named as "Top Dock 1" or "TD01" in facility records.)
- III.F.1.b. Pad 2 - maximum capacity 66,000 gallons of waste in containers; (This area is subdivided into two container management sub-areas known as the "North Pad" or "NP01" and the "South Pad" or "SP01" in facility records.) Each "Pad" has sufficient containment capacity to store the maximum capacity permitted.
- III.F.1.c. Pad 3A - maximum capacity 20,900 gallons of waste in containers. (This area is also named as "Top Dock 2" or "TD02" in facility records.)
- III.F.1.d. Pad 3B - maximum capacity 20,900 gallons of waste in containers. (This area is also named as the "Sample Pad" or "SPAD" in facility records.)
- III.F.1.e. Dock 1, Pad 2 and Pad 3 shall not be considered 90-day storage or satellite storage areas.
- III.F.2. The minimum allowable aisle space shall be two feet six inches except along building walls that may be one foot six inches.
- III.F.2.a. Containers may not be stored more than eight feet high as measured from the floor to the top of the uppermost container.
- III.F.3. All containers of non-hazardous waste stored on Dock 1, Pad 2 or Pad 3 will be considered full of liquid hazardous waste for the purposes of determining compliance with containment standards.
- III.F.4. Container management area sumps shall be inspected in accordance with, Attachment II-3 for presence of liquids. If liquids are discovered in the sump, the Permittee shall determine the source and note this in the inspection log. Any liquids discovered in the sump shall be removed within 48 hours and managed as hazardous waste in accordance with all applicable requirements of this permit.

- III.F.5. All run-off from container storage and management areas identified in Condition III.F.1. shall be collected, analyzed for hazardous wastes characteristics and constituents and disposed of according the applicable portions of the permit.
- III.F.6. Any time the facility plans to increase storage capacities, the Permittee shall submit secondary containment calculations to demonstrate compliance with the secondary containment requirements specified in R315-8-9.6. Any changes to storage capacities shall be subject to the permit modification requirements specified in R315-3-4.3. and Section I.D.

**III.G. BULK SOLID STORAGE AREA**

- III.G.1. The Bulk Solid Storage Area (BSSA) is permitted to store only non-liquid waste in bulk transport containers, such as gondolas, end dumps, and roll-off containers. The BSSA consists of the east (BSSA-E) and west (BSSA-W) areas and both heat tents (HT-L and HT-S), as indicated in the facility plan view located in Attachment II-1. Information concerning the configuration of the BSSA is shown in Attachment III-1.
- III.G.1.a. For purposes of determining compliance with storage capacities, all containers shall be considered full of hazardous waste.
- III.G.2. Non-liquid waste received in bulk transport containers shall not be stored for a period that exceeds one year.
- III.G.3. All containers located in the BSSA shall be inspected daily and managed in accordance with R315-8-9.
- III.G.4. Each of the four storage areas that make up the BSSA may store up to the following quantities:
- III.G.4.a. Bulk Solid Storage Area - East (BSSA-E) may store up to 600 cubic yards.
- III.G.4.b. Bulk Solid Storage Area - West (BSSA-W) may store up to 1,600 cubic yards.
- III.G.4.c. Heat Tent - Large (HT-L) may store up to 280 cubic yards.
- III.G.4.d. Heat Tent - Small (HT-S) may store up to 160 cubic yards.

**III.H. SPECIAL REQUIREMENTS, IGNITABLE OR REACTIVE WASTES**

- III.H.1. The Permittee shall not locate containers holding ignitable or reactive waste within 50 feet of the facility's property line. The Permittee shall comply with R315-8-2.8.



- III.H.2. The Permittee shall electrically ground all containers holding ignitable liquid wastes whenever wastes are added to or removed from those containers (except for sampling).

**III.I. SPECIAL REQUIREMENTS FOR INCOMPATIBLE WASTE**

- III.I.1. The Permittee shall not place incompatible wastes in the same container. The Permittee shall comply with R315-8-2.8.
- III.I.2. The Permittee shall not place hazardous waste in an unwashed container that previously held an incompatible waste or material.
- III.I.3. The Permittee shall document compliance with Condition III.H.1. and Condition III.H.2., as required by R315-8-2.8(c) and place this documentation in the Operating Record.

**III.J. IDENTIFICATION OF LOCATION OF CONTAINERS IN OPERATING RECORD**

The Permittee shall record and maintain the location of all hazardous waste containers when they are placed in storage or relocated in the container management building. The location record of all containers shall show the specific location with coordinates showing pad area and row for each container in the management area. Records shall be maintained for all containers removed from storage showing the status of the container regarding treatment, disposal or disposition. For bulk transport containers the inventory record shall show the area in which each is stored (i.e. BSSA-E, BSSA-W, HT-L and HT-S).

**III.K. INSPECTIONS**

- III.K.1 The Permittee shall conduct daily inspections of the container storage areas identified in Condition III.A. of this permit in accordance with the schedule outlined in Attachment II-3. Inspection requirements as specified in Condition II.F. and R315-8-9.5 shall be followed.
- III.K.2 Special Inspections of Containers of High VOC Wastes Containers of high VOC wastes shall be inspected in accordance with Attachment II-9, "Policy and Procedures for Managing High VOC Wastes under Subpart CC", for proper fit and tightness of covers unless it is emptied within 24 hours of receipt and if not, no later than the same day the manifest for these wastes is signed.

**III.L. CONSTRUCTION OF NEW UNITS**

The Permittee shall comply with Conditions I.Q., covering planned changes, and I.R., certification of new construction and modifications. All new container management systems and modification to existing systems shall also meet containment and leak detection requirements specified in R315-8-9.6.

**III.M. CLOSURE/POST CLOSURE**

The Permittee shall close the container storage areas in accordance with R315-8-7, R315-8-9.9 and Condition II.N.

ATTACHMENT III-1

CONTAINER MANAGEMENT BUILDING AND  
STORAGE AREA DRAWINGS